



## **ASTRAL ASIA BERHAD**

Registration No. 199601002254 (374600-X)  
(Incorporated in Malaysia)

### **Anti-Bribery & Anti-Corruption Policy**

#### **Introduction**

Astral Asia Berhad and its subsidiaries (“AAB Group” or “the Group”) are committed to compliance with the Malaysian Anti-Corruption Commission Act 2009 (“MACC Act”), subsequent amendments to the Act and all guidelines issued by relevant authorities pertaining to the same.

Astral Asia Berhad (“AAB”) sets out Anti-Bribery and Corruption Policy (“the Policy”) statements and other relevant frameworks which approved by the Board of Directors of AAB (“Board”) against the practices of bribery and corruption by the directors (“Directors”) and employees (“Employees”) of AAB Group, as well as persons performing tasks and services for or on behalf of AAB Group (“the Third Parties”). This Policy shall be read in conjunction with the Whistleblowing Policy and Code of Ethics and Conduct of the Group.

#### **Scope of Policy & Applicability**

The Policy should be applied by all of the Board, Employees and the Third Parties in order to prohibit them from being involved in any form of bribery or corruption acts, including where that person by himself, or jointly with any other person corruptly receives or agree to receive or corruptly gives or agree to give, promises or offers to any person whether for the benefit of that person or of another person.

#### **Objective**

The Policy has been developed with the purpose of fulfilling the said legal and regulatory requirements and sets out the Group’s overall position on bribery and corruption in all forms, such as dealing with the Third Parties, managing conflicts of interest, gifts, hospitality, and whistleblowing.

The objective of the Policy is to provide guidance for Board, Employees and the Third Parties and assist them to identify and deal with bribery and corruption issues, as well as understanding their roles and responsibilities.

## **Common Forms of Bribery & Corruption**

### **1. Gifts, Hospitality & Entertainment**

Generally, the Board, Employees and the Third Parties can receive or give reasonable gifts and entertainment which is not prohibited. However, if the action of receiving and giving are with corrupt intention, not reasonable, incommensurate with their positions, too lavish and expensive, such action will be deemed as bribery or corruption.

### **2. Political Contributions**

The Group is prohibited to make or offer monetary or in-kind political contributions to any political party, political party official or candidate running for political office. The Group may only make political contributions which are permitted under applicable laws. The authority is with the Board of AAB to approve such political contributions.

### **3. Donations Support**

The Group allows members of the Company to have donations support (either in cash form or otherwise) that are permitted under applicable laws. The Employees should obtain the approval from the Management of the Company. However, any donations support that will affect the business decisions are strictly prohibited.

### **4. Facilitation Payments**

Any facilitation payments made to secure or expedite the performance of a routine action by a public body which defined in Section 3 of the MACC Act<sup>1</sup> are strictly prohibited.

## **The Third Parties**

All employees should exercise due care and due diligence at all times when dealing with the Third Parties and ensure their affairs do not involve in any form of corruption practices, perceived or actual.

## **Record Keeping**

All records should be in proper filing to be maintained with accuracy and completeness for all payments made to the Third Parties in the ordinary course of business to prove as evidence that such payments not linked to corruption or unethical manner.

Employees must disclose all gifts, hospitality or entertainment that receive or given to respective Department for recording purpose which is subject to internal audit review. All expenses claim from Employees incurred to the Third Parties should be approved by each Head of Department and specifically recorded the reason for such expenses.

### **Consequence of Violating the Policy**

Any Person who knows or suspects a violation of the Policy, is encouraged to whistle blow or report the concerns through the Group's Whistleblowing Policy.

If there is a strong evidence shows that any Employees, Directors and Third Parties committed to bribery and corruption activities, they would be deemed as violating the Policy which may lead to disciplinary action such as termination of employment.

### **Communication & Training**

The Group shall conduct adequate awareness programs, trainings and courses for all relevant personnel on a regular basis to ensure they continue to have clear understanding and awareness of the compliance risks and will continuously carry out their duties with a high level of integrity and ethical standards.

### **Policy Review**

AAB Group and its Board will consistently monitor the compliance of the Policy to take into consideration the needs of the Company as well as any development in rules and regulations.